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7

8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 CATALIN LAURENTIU BOTA,

10 Plaintiff,

11 v.

12 ALEJANDRO MAYORKAS, in his official  
capacity as Secretary of Homeland Security,  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, UR M. JADDOU, in her  
official capacity as Acting Director of U.S.  
Citizenship and Immigration Services, U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES, the UNITED STATES OF  
AMERICA and JOHN DOES I through  
XX, inclusive,

18 Defendants.

Case No. 2:23-cv-01948-GMN-DJA

**Stipulation and Order**

**(Second Request)**

20 Plaintiff Catalin Laurentiu Bota and Defendants Alejandro Mayorkas, Secretary of  
21 Homeland Security, US Department of Homeland Security, Ur M. Jaddou, Acting  
22 Director of U.S. Citizenship and Immigration Services, United States Citizenship and  
23 Immigration Services and United States of America (“Federal Defendants”), hereby  
24 stipulate and agree as follows:

25 Plaintiff filed his Complaint on November 22, 2023.

26 Plaintiff served the United States with a copy of the Complaint via Certified Mail on  
27 November 30, 2023.

The current deadline for the United States to respond to the Plaintiffs' Complaint is on March 14, 2024.

Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and request that the Court approve a 90-day extension of time, from March 14, 2024, to June 12, 2024, for Federal Defendants to file a response to the Complaint, ECF No. 1. This is the second request for an extension of time.

Defense counsel was informed by United States Citizenship and Immigration Services that it is waiting on a response from Plaintiff to a Notice it issued on February 15, 2024. The extension is needed to allow time for plaintiff to submit his response, and for the immigration officer to review the evidence and issue a decision.

Therefore, the parties request that the Court extend the deadline for the United States to answer or otherwise respond to June 12, 2024.

This stipulated request is filed in good faith and not for the purposes of undue delay.

Respectfully submitted this 11th day of March, 2024.

REZA ATHARI, MILLS & FINK, PLLC

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## **IT IS SO ORDERED:**

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: March 12, 2024